Edwards Systems Technology, Inc.	**)**	**Departmental**
Somerset County	**)**	**Findings of Fact and Order**
Pittsfield, Maine	**)**	**Air Emission License**
A-398-71-J-R		

After review of the air emissions license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Edwards Systems Technology, Inc. (Edwards Systems) of Pittsfield, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their Pittsfield, Maine fire alarm manufacturing facility.

B. Emission Equipment

Edwards Systems is authorized to operate the following air emission units:

Fuel Burning Equipment

Equipment	Date of Construction	Maximum Capacity (MMBtu/hr)	Fuel Type, %Sulfur	Maximum Firing Rate (i.e. gal/hr)	Stack #
Boiler #3	1979	10.5	#5 or #6 oil., 1.5	70	S1
Boiler #4	1970	5.3	#5 or #6 oil., 1.5	35	S1

Incinerator

Equipment	Feed Rate	Primary Chamber	Secondary Chamber	Waste Type	Stack ID
Class VII Incinerator	35 lb/ 4-hr cycle	0.15 MMBtu/hr, LP Gas	0.15 MMBtu/hr, LP Gas	6	S4

Process Equipment

Equipment	Emissions	Pollution Control Equipment	Stack #
Lacquer Spray Booth (3 booths)	VOC, particulate	Filter	S2, S3, S12
Spray Washer	Iron Phosphate		S5A, S5B
Powder Paint/Drying Oven	Propane		S6A, S6B
Manual Buffing (4 buffing wheels)	Particulate	Cyclone	S10
Wave Solder Machine	(VOC) Ethyl Alcohol		S11
Varnish Dip Tank Exhaust (Dept 150)	(VOC) varnish		S15A
Varnish Curing Oven (Dept 150)	12 kW electric		S15B
Smoke Box Exhaust (6 smoke boxes)	Burned cotton		S16, S20, S20A
Solder Screen Cleaner	VOC, particulate		Vent #1
Solder Smoke Exhaust (3 units)	Solder smoke		S17, S18A, S18B
Aqueous Washers	Water vapor		S25

Edwards Systems has additional insignificant activities which do not need to be listed in the emission table above.

C. Application Classification

The application for Edwards Systems of Pittsfield, Maine does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent best practical treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Boilers #3 and #4

Boiler #3 is a Cleaver Brooks boiler with a design capacity of 10.5 MMBtu/hr heat input firing #5 or #6 fuel oil. Boiler #3 was manufactured in 1979 prior to the New Source Performance Standards (NSPS) applicability date and is therefore not subject to EPA's NSPS Subpart Dc.

Boiler #4 is a Cleaver Brooks boiler with a design capacity of 5.3 MMBtu/hr heat input firing #5 or #6 fuel oil. Boiler #4 was installed in 1986 and manufactured in 1970. Boiler #4 has a maximum heat input capacity below the applicability threshold and is therefore not subject to EPA's NSPS Subpart Dc.

As previously licensed, Edwards Systems is subject to an annual facility wide fuel usage restriction of no more than 414,800 gallons per year of #5 or #6 fuel oil with a sulfur content of no greater than 1.5% sulfur by weight based on a twelve-month rolling total. Compliance shall be demonstrated by a fuel purchase record which shall include fuel purchase receipts indicating the amount of fuel purchased and certification from the supplier indicating the sulfur content of the purchased fuel.

A summary of the BPT analysis for Boiler #3 (11.5 MMBtu/hr) and Boiler #4 (5.3 MMBtu/hr) is as follows:

1 Use of fuel having a sulfur content of no greater than 1.5% sulfur by weight.
2 SO_2, CO and VOC emission rates are based on AP-42 data dated 10/96 for industrial boilers.
3 Emission rates for PM/PM_{10} are based on MEDEP Regulations, Chapter 103.
4 NO_X emission rates are based upon past experience with #5 and #6 fuel oil.
5 Visible emissions from the common stack (S1) for Boilers #3 and #4 shall not exceed an opacity of 30% on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

C. Incinerator Emissions

Edwards Systems operates a Pollution Control Products manufactured, Controlled Pyrolysis Cleaning Furnace, Class VII incinerator with propane fired primary and secondary chambers with heat input capacities of 0.15 MMBtu/hr each. The Class VII incinerator has a maximum design feed rate of 35 pounds per 4-hour cycle and is used for type 6 waste. The Class VII incinerator is a controlled pyrolysis incinerator utilized to remove cured paint from the part racks used in the powder paint process. Racks are heated in the first chamber to 700-800^{o}F to decompose the combustible material in the cured paint. The temperature of the gases generated in the first chamber is raised to 1200^{o}F or more in the secondary (or afterburner) chamber.

Edwards Systems shall operate the incinerator such that the combustion gases are treated at a minimum of 0.5 seconds at 1200°F or higher in the secondary chamber. A log will be maintained recording the weight of the waste charged, charging time and the temperature of the secondary chamber every 60 minutes after start-up until, and including, final shutdown time.

The incinerator operator(s) shall receive adequate training to operate the incinerator in accordance with the manufacturer's specifications and shall be familiar with the terms of the Air Emission License.

A summary of the BPT analysis for Incinerator #1 is as follows:

1. BPT for PM/PM_{10} emissions from waste incinerators is 0.2 grs/dscf.
2. SO_2, NO_x, CO and VOC emission limits are based upon AP-42 data dated 10/96 for the combustion of propane gas.
3. Visible emissions from the incinerator stack shall not exceed 10% opacity on a 6-minute block average.

D. Existing Process Equipment

1. Lacquer Spray Booths

Edwards Systems operates three spray booths (vents S2, S3 and S12), in which solvent-based paints consisting mostly of toluene with smaller fractions of other solvents are applied. These spray booths utilize a Kraft paper filter for particulate control on the exhaust line, which exits to roof stacks.

Assuming the volatile components in the lacquer are emitted as VOC vapor, Edwards Systems shall not emit more than 15.5 tons/year of VOC emissions from the lacquer spray booths based on a twelve-month rolling total. Edwards Systems shall maintain a record of lacquer use, which shall include the amount and date of lacquer used, the lacquer VOC content and calculations of the VOCs emitted based on a twelve-month rolling total.

2. Electrostatic Paint Booth Washer and Parts Dryer

Prior to entering the two electrostatic painting operations, parts are first washed by a spray washer (consisting of vents S5A and S5B), which utilizes a dilute water/iron phosphate solution to clean the parts.

After washing, the parts are passed through a 1.5 MMBtu/hr propane fired parts dryer (exhausting to vents S6A and S6B). After the electrostatic painting operation, the same propane dryer also cures parts.

Emission rates for the parts dryer are based on AP-42 data dated 10/96 for the combustion of propane. Emissions from the parts dryer shall be limited to the following based on continuous (8760 hr/yr) operation:

Pollutant	lb/hr	Tons/yr
PM	0.003	0.01
PM_{10}	0.003	0.01
SO_2	0.02	0.08
NO_x	0.2	1.0
CO	0.05	0.2
VOC	0.008	0.04

Visible emissions from the oven shall not exceed 10% opacity on a 6-minute block average.

3. Manual Buffing

Four manual buffing wheels are utilized to buff metal parts. Particulate emissions from the four wheels are ducted to a combined exhaust (vent S10) which vents through a mechanical cyclone. Solids are discharged from the bottom of the cyclone into a 55-gallon drum. The drum is emptied periodically, and the emissions are assumed to be negligible.

Visible emissions from the buffing line exhaust cyclones shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

4. Soldering Operations

a. Wave Solder Machine

A wave solder machine automatically solders whole circuit board systems, and the exhaust is ducted to the roof (vent S11). Based on testing performed by Industrial Hygiene/New England (Project # 980432), less than minimum detectable levels of lead are emitted from this equipment. Circuit boards are first applied with an Ethyl Alcohol Flux prior to having the solder applied.

b. Manual Soldering Lines

Edwards Systems operates three manual solder lines which are semi-enclosed and vented to the roof (vents S17, S18A and S18B) for nuisance reasons.

As per Edwards Systems previous license, lead emissions from the soldering processes shall be restricted to no greater than 0.4 tons of lead per year. BPT for the facilities soldering operations shall be emissions testing for lead within the first 18 months following the signing of this license in order to demonstrate that the emission restriction is being met.

Visible emissions from each soldering process exhaust vent shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

5. Varnish Dip/Oven

Edwards Systems also operates two varnishing operations, which are used to seal transformer windings to prevent rusting and operational noise. The first process is to dip the transformer in a tank of Dolph CC-1105 varnish and emissions are vented to the roof (S15A). Next, the transformer is dried in a 12 kW electrical oven, which is also vented to the roof (S15B).

Visible emissions from each varnish dip/oven process exhaust vent shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

Annual VOC emissions from the varnish dip process shall not exceed a total of 5.0 tons per year based on a twelve-month rolling total. Edwards Systems shall maintain a record of varnish use, which shall include the amount of varnish used, the varnish VOC content and calculations of the VOCs emitted based on a monthly and twelve-month rolling total.

6. Smoke Box Exhaust

Six small smoke boxes are operated to test alarms with smoke generated from the burning of a cotton fabric wick. Emissions from this process are vented to the roof (vents S16). Other smoke boxes utilized at Edwards Systems for the same purpose exhaust via vents S20 and S20A. Emissions are assumed to be negligible.

E. Solder Screen Cleaner

Edwards Systems makes use of a Solder Screen Cleaner for cleaning screens used in the surface-mount electronic assembly line. The unit is located adjacent to the assembly line for processing (cleaning) each screen after a production run is complete. Solder Screen Cleaner is a hermetic unit containing a 13-gallon tank for wash solvent, a 13-gallon tank for rinse solvent, spray jet cleaners and a compressed air drying system.

Screens are placed on racks in the unit and are then cleaned and rinsed via spray jets. Solvent is directed back to its respective tank during its respective cycle. The unit will then enter a drying cycle during which compressed air is directed at the screens to evaporate any residual cleaning solvent.

The unit makes use of isopropyl alcohol as both the wash and rinse solvent and the unit makes use of cartridge filters for cleaning the alcohol as it is circulated and used from each tank. Approximately once per month, the wash alcohol is disposed of as hazardous waste, the rinse alcohol is transferred to the wash tank and new alcohol is added to the rinse tank. The unit also losses some of the alcohol to evaporation, which gets vented to the outside during the drying period of the cleaning process. Between evaporation losses and replacement of used solvent, the unit uses approximately 400 gallons of isopropyl alcohol per year.

As per Edwards Systems previous license, VOC emissions from the Solder Screen Cleaner are restricted to 2.5 tons of VOCs per year. Edwards Systems shall maintain a record of solvent use that shall include the amount of solvent added to the unit and the dates that the solvent was added. The record shall be maintained on a monthly and a twelve-month rolling total basis. For purposes of record keeping, the amount of solvent used shall be considered as the difference between the amount of solvent added and the amount of solvent removed. Edwards Systems shall also maintain a record of VOC emissions from the unit. VOC emissions shall be calculated by multiplying the amount of solvent used by a factor of 0.88 pounds of VOCs per gallon. The VOC emission records shall be maintained on a monthly and twelve-month rolling total basis.

F. Degreaser

Edwards Systems makes use of two 20-gallon parts degreaser units. The degreasers use a water-based degreaser with 5% maximum ethylene glycol monobutyl ether (a Hazardous Air Pollutant) solvent as the cleaning medium. Edwards Systems uses less than 100 gallons of this solution per year.

Edwards Systems shall maintain a record of solvent use that shall include the amount of solvent added to the degreaser units and the dates that the solvent was added. The record shall be maintained on a monthly and a twelve-month rolling total basis. For purposes of record keeping, the amount of solvent used shall be considered as the difference between the amount of solvent added and the amount of solvent removed. If, in the future, Edwards Systems switches to a solvent that contains 1% VOC or less for use in the parts degreaser, to satisfy record keeping requirements Edwards Systems need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Edwards Systems facility.

1. In accordance with Chapter 130, Section 3A of the Department regulations, Edwards Systems shall equip the parts degreasing unit with the following:

   a. Equip the parts degreasing units with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitated or if the solvent is heated. [MEDEP Chapter 130]

   b. Equip the parts degreasing units with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100^{o}F, except that the drainage basket may be external where an internal basket cannot fit into the degreaser. [MEDEP Chapter 130]

   c. Affix the parts degreasing units with a permanent conspicuous label summarizing the following operating standards:

      - Close cover when not in use,
      - Drain cleaned parts for at least 15 seconds or until dripping ceases,
      - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
      - Do not degrease porous or absorbent materials,
      - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
      - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired [MEDEP Chapter 130]

2. In accordance with Chapter 130, Section 3A of the Department regulations, Edwards Systems shall follow operational standards when making use of the facility's parts degreasers. [MEDEP Chapter 130]

3. In accordance with Chapter 130, Section 3A of the Department regulations, Edwards Systems shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F:

   i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
   ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or

iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA). [MEDEP Chapter 130]

G. Annual Emission Restrictions

Edwards Systems is assessed fees based on the following annual emissions, based on a twelve-month rolling total:

- 414,800 gallons per year of #5 or #6 fuel oil (1.5% maximum sulfur by weight) was used for calculating ton per year emissions from boilers;

- Emissions from continuous operation (8760 hours/year) of the incinerator and parts dryer, as well as the VOC limits stated for the other processes, were also used for calculating the limits stated below.

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

Pollutant	Tons/yr
PM	8.3
PM_{10}	8.3
SO_2	50.3
NO_x	15.7
CO	1.3
VOC	23.3
Total HAPs	5.0
Lead	0.4

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the total facility emissions, Edwards Systems is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-398-71-J-R, subject to the following conditions:

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(6) The license does not convey any property rights of any sort, or any exclusive privilege.

(7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.

(8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a license or amendment shall not stay any condition of the license.

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or

b. pursuant to any other requirement of this license to perform stack testing.

(ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(iii) submit a written report to the Department within thirty (30) days from date of test completion.

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

(i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

(13) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.

(15) Upon written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(16) Boiler Units

a. Boiler #3 (10.5 MMBtu/hr) and Boiler #4 (5.3 MMBtu/hr) shall be limited to the following limits based on the use of #5 or #6 fuel oil, both with a sulfur content not to exceed 1.5% by weight.

Equipment		PM	PM_{10}	SO_2	NO_x	CO	VOC
Boiler #3	lb/MMBtu	0.2	n/a	n/a	n/a	n/a	n/a
	lb/hr	2.1	2.1	16.5	5.3	0.4	0.08
Boiler #4	lb/MMBtu	0.2	n/a	n/a	n/a	n/a	n/a
	lb/hr	1.1	1.1	8.3	2.7	0.2	0.04

[MEDEP Chapter 115, BPT]

b. Visible emissions from the common stack (S1) for Boilers #3 and #4 shall not exceed an opacity of 30% on a 6-minute block average basis, except for two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]

c. Edwards Systems is limited to firing no more than 414,800 gallons of #5 or #6 fuel oil (1.5% maximum sulfur by weight) per year based on a twelve-month rolling total, in the facility's boilers, documented by means of a fuel purchase record. [MEDEP Chapter 115, BPT]

(17) Incinerator

a. The Class VII incinerator (0.30 MMBtu/hr total) shall not exceed the maximum design feed rate of 35 pounds per 4 hours. [MEDEP Chapter 115, BPT]

b. Based on the waste stream content, a licensed allowed particulate matter emission limit of 0.2 gr/dscf corrected to 12% CO_2, the burning of Liquid Propane gas as an auxiliary fuel, the use of AP-42 emission factors and continuous operation (8760 hours/year), emissions shall be limited to the following:

Pollutant	gr/dscf	lb/hr	TPY
PM	0.2	0.6	2.4
PM_{10}	-	0.6	2.4
SO_2	-	0.3	1.4
NO_x	-	0.05	0.2
CO	-	0.01	0.04
VOC	-	0.002	0.01

[MEDEP Chapter 115, BPT]

c. Visible emissions from the Class VII incinerator shall not exceed an opacity of 10% on a 6-minute block basis. [MEDEP Chapter 101]

(18) Process Emissions

a. Lacquer Spray Booths

VOC emissions from the lacquer spray booths shall not exceed 15.5 tons per year based on a twelve-month rolling total. Edwards Systems shall maintain a record of lacquer use, which shall include the amount of lacquer used, date of lacquer use, the VOC content of the lacquer and calculations of the VOCs emitted based on a twelve-month tolling total. [MEDEP Chapter 115, BPT]

b. Electrostatic Parts Dryer

1. Emissions from the 1.5 MMBtu/hr, propane fired, electrostatic parts dryer shall be limited to the following based on the use of Propane gas and continuous (8760 hr/yr) operation:

Pollutant	lb/hr
PM	0.003
PM_{10}	0.003
SO_2	0.02
NO_x	0.2
CO	0.05
VOC	0.008

[MEDEP Chapter 115, BPT]

2. Visible emissions from the oven shall not exceed 10% opacity on a 6-minute block average.

c. Manual Buffing

Visible emissions from the buffing line exhaust cyclones shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

d. Soldering Processes

1. Lead emissions from the soldering processes shall be restricted to no greater than 0.4 tons of lead per year. Edwards Systems shall test the soldering process exhausts for lead within the first 18 months following the signing of this license in order to demonstrate that the lead emission restriction is being met.

2. Visible emissions from each soldering process exhaust vent shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

e. Varnish Dip/Oven

1. Visible emissions from each varnish dip/oven process exhaust vent shall be restricted to an opacity of no greater than 20% on a 6-minute block average basis except for no more than one 6-minute block average in a 1-hour period.

2. Annual VOC emissions from the varnish dip process source shall not exceed a total of 5.0 tons per year based on a twelve-month rolling total. Edwards Systems shall maintain a record of varnish use, which shall include the amount of varnish used, the varnish VOC content and calculations of the VOCs emitted based on a monthly and twelve-month rolling total.

(19) Solder Screen Cleaner

VOC emissions from the Solder Screen Cleaner are restricted to 2.5 tons of VOCs per year based on a twelve-month rolling total. Edwards Systems shall maintain a record of solvent use that shall include the amount of solvent added to the unit and the dates that the solvent was added. The record shall be maintained on a monthly and a twelve-month rolling total basis.

(20) Parts Degreaser

A. In accordance with Chapter 130, Section 3A of the Department regulations, Edwards Systems shall follow equipment and operational standards when making use of the parts degreaser. [MEDEP Chapter 130]

B. In accordance with Chapter 130 section 3A of the Department regulations, Edwards Systems shall equip the parts degreasing unit with the following:

1. Equip the parts degreaser with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitate or if the solvent is heated. [MEDEP Chapter 130]

2. Equip the parts degreaser with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100^{o}F, except that the drainage basket may be external where an internal basket cannot fit into the degreaser. [MEDEP Chapter 130]

3. Affix the parts degreaser with a permanent conspicuous label summarizing the following operating standards:

   - Close cover when not in use,
   - Drain cleaned parts for at least 15 seconds or until dripping ceases,
   - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
   - Do not degrease porous or absorbent materials,
   - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
   - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired [MEDEP Chapter 130]

C. In accordance with Chapter 130 section 3A of the Department regulations, Edwards Systems shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F:

   i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
   ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or
   iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA). [MEDEP Chapter 130]

D. Edwards Systems shall maintain a record of solvent use for the parts degreaser. The record shall include solvent added and removed, the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent. If, in the future, Edwards switches to a solvent that contains 1% VOC or less for use in the parts degreaser, to satisfy record keeping requirements Edwards Systems need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Edwards Systems facility. [MEDEP Chapter 140, BPT]

(21) Edwards Systems shall emit less than 5 tons per year of total Hazardous Air Pollutants (HAP as defined in Chapter 115, Appendix B, Section C) from units or activities which are not listed as “insignificant” in Chapter 115, Appendix B, Section B and shall keep a record of all the HAP emitted from units or activities which are not listed as “insignificant” in Chapter 115, Appendix B, Section B on a 12 month rolling average. [MEDEP Chapter 115]

(22) Edwards Systems shall comply with Chapter 129 (Surface Coating Facilities) by use of weekly weighted averaging as calculated in accordance with Appendix A, Procedure C, substituting "weekly" for "daily". [MEDEP Chapter 129]

(23) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department;

   or

2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by September 1 or as otherwise specified in Chapter 137. [MEDEP Chapter 137]

(24) Edwards Systems shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C). [MEDEP Chapter 115]

(25) Edwards Systems shall pay the annual air emission license fee within 30 days of June 30 of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for the revocation of the license under 38 MRSA 341-D, Subsection 3.

[38 MRSA 353-A, 38 MRSA 341-D]

(26) The term of this order shall be for five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **November 26, 2003**
Date of application acceptance: **November 26, 2003**

Date filed with the Board of Environmental Protection _____

This Order prepared by Peter G. Carleton, Bureau of Air Quality